



SDMS DocID 2020457

February 3, 2004

FEB 09 2004

By Fax and U.S. Mail

Ms. Carlyn Winter Prisk (3HS11)
U.S. Environmental Protection Agency
1650 Arch Street
Philadelphia, PA 19103-2029

Re: Follow-up 104(e) Request – Presbyterian Medical Center
Lower Darby Creek Area Superfund Site
Delaware and Philadelphia Counties, Pennsylvania

Dear Ms. Prisk:

I am writing on behalf of Presbyterian Medical Center (“Presbyterian”), to respond to an Environmental Protection Agency (“EPA”) follow-up information request dated November 25, 2003, as amended and supplemented by letter received by Presbyterian on December 3, 2003 (“Follow-Up Information Request”). As you and counsel for Presbyterian, Brian G. Glass of Ballard Spahr Andrews & Ingersoll, LLP, agreed, Presbyterian’s response to the Follow-Up Information Request is due on or before February 3, 2004. Presbyterian’s answers, preceded by the number or subpart of the question to which they correspond, are as follows:

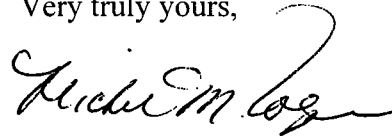
1. Presbyterian discerns only a subtle difference between this question (and its subparts) and question #3 (“Question #3”) from EPA’s November 7, 2001 Information Request (“2001 Request”). Presbyterian has personnel records dating back to 1982, the earliest of which are fragmented and incomplete. From these records, Presbyterian has not been able to identify any person currently or formerly employed by Presbyterian who has or may have personal knowledge of its operations and waste disposal practices between 1958 and 1976. However, in responding to the 2001 Request, Presbyterian, in an effort to be as helpful as possible, interpreted Question #3 broadly to include all persons who had or may have had any information relating to its operations and waste disposal practices between 1958 and 1976. Presbyterian emphasizes that these persons were included in the 2001 Request, and are incorporated again here, only because they, due to their current and/or former positions at Presbyterian, represent the logical repository of any institutional knowledge regarding Presbyterian’s historical waste disposal practices. However, as is apparent from Presbyterian’s January 7, 2002 response (“2002 Response”), this institutional knowledge is extremely limited. With these qualifications, Presbyterian incorporates by reference its response to Question #3 from the 2001 Request, and, by way of further answer, responds:

- Kim Deppert
Administrator of the Department of Surgery & Medicine
1988 to present
39th & Market Streets, Philadelphia, PA 19104-2699
215-662-9643;
- Bernard Dyer
Director of Safety Management for the University of Pennsylvania Health System
12/11/2000 to present
39th & Market Streets, Philadelphia, PA 19104-2699
215-662-7233;
- Diane Kelly
Former Vice President of Human Resources and Operations
Dates unknown
Last known address is Manchester, Inc., Philadelphia, PA
Last known telephone number is, after reasonable investigation, unknown;
- Cherylanne Kiedaisch (nee Pultorak)
Safety Manager
1995 to present
39th & Market Streets, Philadelphia, PA 19104-2699
215-662-8631;
- Joan McKeown (deceased)
Former Director of Safety
Unknown period to 1994 or 1995;
- Michael Sheerin,
Associate Executive Director for Support Services and Surgery
1996 to present
39th & Market Streets, Philadelphia, PA 19104-2699
215-662-9859;
- Edward Sloan
Former Safety Coordinator
1994 to 1999
Last known address and telephone number are, after reasonable investigation,
unknown; and
- Michele Volpe
Executive Director
1996 to present
39th & Market Streets, Philadelphia, PA 19104-2699
215-662-8260.

2. Presbyterian conducted an internal investigation prior to its 2002 Response. Presbyterian did not maintain formal statements of interviews it conducted during that time; all responsive information from interviews conducted was incorporated in the 2002 Response. Presbyterian did not interview those persons who were no longer with Presbyterian.

Presbyterian specifically reserves the right to amend or supplement its response to the extent that it deems necessary and permitted pursuant to paragraph 4 of Enclosure E of the Follow-Up Information Request.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Michele Volpe".

Michele Volpe
Executive Director

MV/bgg

cc: Roman Petyk, Esquire
Brendan K. Collins, Esquire
Brian G. Glass, Esquire